

# EXHIBIT F

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CHRISTOPHER CORCORAN, et al.,  
Plaintiffs  
v.  
CVS PHARMACY, INC.,  
Defendant

No. 15-CV-03504-YGR

## **DECLARATION OF GERALD LEWANDOWSKI**

**CVS PHARMACY, INC.,**  
**Defendant**

I, Gerald Lewandowski, am over the age of 18 and am competent to give this Declaration. I make this Declaration based on personal knowledge of the matters set forth herein:

1. I am currently a Managing Director with Berkeley Research Group (“BRG”), a consulting firm that provides independent advice, data analytics, authoritative studies, expert testimony, investigations, and regulatory and dispute consulting to Fortune 500 corporations, financial institutions, government agencies, major law firms, and regulatory bodies around the world. I have spent over 20 years providing consulting services to numerous entities in the healthcare industry regarding data analytics, economic, information technology, regulatory, damages and discovery issues. Much of my work has related to analyzing transaction-level pharmacy prescription data, claims payment data, eligibility data, and other systems related to transactions between entities in the pharmacy supply chain.

2. BRG has been retained in the above-captioned matter by Williams & Connolly LLP and CVS Pharmacy, Inc. (“CVS”). In the matter, BRG has assisted with the collection, quality-checking, and preparing for production of large amounts of transaction data extracted from CVS’s Pharmacy Data Warehouse.

3. CVS personnel extracted from its Pharmacy Data Warehouse certain information related to transactions identified in Plaintiffs' expert report attached to Plaintiffs' Amended

1 Motion for Class Certification (June 6, 2017) [Dkt No. 274], and provided that information to  
2 BRG. I have reviewed the information provided by CVS.

3 4. There are 4,750,268 customers in the data provided by CVS associated with the  
4 transactions identified by Plaintiffs' expert report as allegedly fitting within the class definitions  
5 for the California, Florida, Illinois, and Massachusetts certified classes.

6 5. There are 6,154,351 customers in the data the data provided by CVS associated  
7 with the transactions identified by Plaintiffs' expert report as allegedly fitting within the class  
8 definitions for the currently-certified for California, Florida, Illinois, and Massachusetts, and the  
9 putative-classes for Arizona and New York.

10 6. For these 6,154,351 customers, the data provided to BRG from CVS's Pharmacy  
11 Data Warehouse show: a mailing address for 99.95% of the customers; a cell phone number for  
12 51% of the customers; and an e-mail address for less than 1% of the customers.

13 7. With 48 hours notice, BRG can produce to Angeion Group, LLC the available  
14 names and mailing addresses for the 4,750,268 and/or 6,154,351 groups of customers.

15 I hereby declare under penalty of perjury that the foregoing is true and correct.

16 DATED: October 7, 2019

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18 GERALD LEWANDOWSKI  
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